

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

SHAWN NORTHRUP,

Plaintiff,

v.

CITY OF TOLEDO, et al,

Defendants.

) Case No.: 3:12-CV-01544-JHH
)

) Judge: Jeffrey J. Helmick
)

) **MOTION FOR LEAVE TO**
) **AMEND COMPLAINT BY**
) **INTERLINEATION**
)

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)

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Plaintiff, Shawn Northrup (“Northrup” or “Plaintiff”), moves the Court grant this motion for leave to amend his complaint by interlineation under Rule 15(A). Plaintiff makes this request

in order to correct an error in the naming of Defendants and in support thereof, shows the Court that:

1. Plaintiff filed his original complaint on June 15, 2012.
2. Subsequent to the Plaintiff's filing of his complaint, Defendant's noticed an error as to one of the parties named as Defendants. The error is:
 - a. City of Toledo Police Division is named as a Defendant.
 - b. The complaint should name "City of Toledo" in place of "City of Toledo Police Division."

Defendants have consented to the entry to amend by interlineation.

WHEREFORE, Plaintiff respectfully requests that the Court issue an order granting him leave to amend the Plaintiff's Complaint as outlined above by interlineations, and for all other proper relief.

Respectfully submitted,

/s/ Daniel T. Ellis

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Attorney for Plaintiff
Shawn Northrup

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the following parties via the Court's electronic filing system, this 16th day of October, 2014:

John Madigan, Senior Attorney
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Counsel for Defendants

/s/ Daniel T. Ellis

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